

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>RODERICK NAPOLEON HARRIS,</b>	)	
	)	
<b>Petitioner,</b>	)	
	)	
<b>v.</b>	)	<b>No. 3:20-cv-03702-E</b>
	)	
<b>BOBBY LUMPKIN, Director,</b>	)	<b>Capital Case</b>
<b>Texas Department of Criminal Justice,</b>	)	
<b>Correctional Institutions Division,</b>	)	
	)	
<b>Respondent.</b>	)	

**MOTION FOR WITHDRAWAL AND  
SUBSTITUTION OF COUNSEL**

Pursuant to Local Civil Rule Civil Rule 83.12, Petitioner, **RODERICK NAPOLEON HARRIS**, by undersigned counsel, Michael Mowla and substituting attorneys Gwendolyn C. Payton and Adam H. Charnes, respectfully request the Court grant the withdrawal of current counsel Michael Mowla and substitution of Gwendolyn C. Payton and Adam H. Charnes as counsel of record in this proceeding. Gwendolyn C. Payton and Adam H. Charnes seek to substitute as counsel as pro bono counsel through the appeal and all proceedings subsequent to the direct appeal, including but not limited to any petition for certiorari to the United States Supreme Court and subsequent State and federal habeas proceedings, representation before the Clemency Section of the Texas Board of Prison Pardons of Paroles, and stays of execution.

Ms. Payton contact information is as follows:

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Mr. Charnes' contact information is as follows:

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WHEREFORE, Petitioner, Mr. Harris, through his attorneys, Michael Mowla and substituting attorneys Gwendolyn C. Payton and Adam H. Charnes, respectfully requests this Court grant the withdrawal of Mr. Mowla as counsel and substitution of Ms. Payton and Mr. Charnes as counsel.

DATED: November 22, 2024.

Respectfully submitted,

/s/ Michael Mowla

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*Withdrawing Counsel of Record for Petitioner,  
Roderick Napoleon Harris*

/s/ Adam H. Charnes

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*Substituting Counsel of Record for Petitioner,  
Roderick Napoleon Harris*

/s/ Gwendolyn C. Payton

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*Substituting Counsel of Record for Petitioner,  
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**CERTIFICATE OF SERVICE**

I certify that on November 22, 2024, a copy of this document was served upon all parties and attorneys of record via the ECF filing system.

/s/ Gwendolyn C. Payton

Gwendolyn C. Payton